IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

REGARDING:

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION CIVIL ACTION NO.: 2:18-CV-02003-DCN

Chris Templeton,

Plaintiff.

VS.

The Bishop of Charleston, a Corporation Sole,

DECLARATION OF REV. TIMOTHY J. WATTERS

Defendant.

- I, Rev. Timothy J. Watters declare as follows:
- 1. I am over the age of 18 and have personal knowledge of the matters herein.
- 2. I am a retired priest of the Diocese of Charleston, South Carolina.
- 3. I served as *Advocate* and later *Officialis* of the Diocesan Tribunal, which is the ecclesiastical court for the Diocese.
- 4. I have no information regarding the accusations against Fr. DuMouchel, nor do I have any information regarding Chris Templeton and his claims.
- 5. I have no information regarding Wayland Yoder Brown's criminal activities, nor do I have any information regarding Chris Templeton and his claims. I met Wayland Brown briefly in 1977 when I was visiting St. Joseph's Parish in Charleston. Wayland Brown was visiting Rev. Thomas Evatt and Rev. Christopher Lathem, both of whom resided at St. Joseph's. I recall him only because he used sexual innuendo as a form of humor, which was unusual for a priest.

- 6. I am not aware of any canonical or ecclesiastical proceeding regarding Fr.

 DuMouchel or Wayland Brown during the years I was appointed to the Diocesan Tribunal.
 - 7. I possess no documents requested by the Plaintiff in the subpoena.
 - 8. I have no idea who Janet Warren is, and have no information regarding her.
 - 9. I have had no communication with Dawes Cooke.
- 10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

- Fino. Le Palle

October 29, 2020

1 **CERTIFICATE OF SERVICE** I hereby certify that on the 30th day of October, 2020, I electronically filed the foregoing 2 with the Clerk of the Court using the CM/ECF system when will send notification of such filing to the following: 3 J.D. Smith, WSBA #28246 4 LAW OFFICE OF J.D. SMITH, PLLC 8015 SE 28th St., Suite 212 5 Mercer Island, WA 98040 Phone: 206-588-8529 6 Fax: 206-588-8531 Email: JD@JDSmithLaw.com 7 Attorney for Plaintiff 8 I hereby certify that on the 30th day of October, 2020, I sent via electronic mail the foregoing document to the following non CM/ECF participants: 9 Mark A. Tate 10 TATE LAW GROUP, LLC 25 Bull Street, 2nd Floor 11 Savannah, GA 31401 Phone: 234-3030 12 Email: marktate@tatelawgroup.com Attorney for Plaintiff 13 Charles Henshaw, Jr. 14 **FURR & HENSHAW** 1900 N. Oak Street 15 Myrtle Beach, SC 29578 Phone: 843-626-7621 16 Email: Charles.henshaw@fholaw.com Attorney for Plaintiff 17 CHRISTIE LAW GROUP, PLLC 18 By /s/Robert L. Christie 19 ROBERT L. CHRISTIE, WSBA #10895 2100 Westlake Avenue N., Suite 206 20 Seattle, WA 98109 Phone: 206-957-9669 21 Email: bob@christielawgroup.com DECLARATION OF REV. TIMOTHY J. CHRISTIE LAW GROUP, PLLC WATTERS 2100 Westlake Avenue N., Suite 206 (Case No. 2:20-cv-01578-MJP) **SEATTLE, WA 98109**

206-957-9669